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**Hearing Date and Time:**  
December 19, 2019 at 11:00 a.m.

*Attorneys for Counsel Financial II LLC, LIG  
Capital LLC, and Counsel Financial Holdings LLC*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK  
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In re:

Chapter 11

JEFFREY LEW LIDDLE,

Case No. 19-10747 (SHL)

Debtor.

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**OBJECTION BY COUNSEL FINANCIAL II LLC, LIG CAPITAL LLC,  
AND COUNSEL FINANCIAL HOLDINGS LLC TO (I) FIRST  
APPLICATION OF FOLEY HOAG LLP FOR INTERIM ALLOWANCE  
OF COMPENSATION AS COUNSEL TO THE DEBTOR [DOC. 254] AND  
(II) FIRST INTERIM APPLICATION OF EISNERAMPER LLP, AS  
ACCOUNTANTS TO DEBTOR [DOC 255]<sup>1</sup>**

TO THE HONORABLE SEAN H. LANE,  
UNITED STATES BANKRUPTCY JUDGE:

Counsel Financial II LLC (“CF2”), LIG Capital LLC (“LIG”), and Counsel Financial Holdings LLC (“Holdings” and together with LIG and CF2, collectively “Counsel Financial”), by their attorneys, Davidoff Hutcher & Citron LLP, submit the following objection to the (i) first application of Foley Hoag LLP (“Foley”) for interim allowance of compensation as counsel to the Debtor [Doc. 254], and (ii) first interim application of EisnerAmper LLP (“EisnerAmper”) [Doc. 255] and represent and state:

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<sup>1</sup> References to “Doc.” refer to documents filed on the docket in this case.

1. Counsel Financial incorporates by reference the objections it previously filed to the monthly statements of Foley [Doc. 235] and EisnerAmper [Doc. 253] (together the “Prior Objections”), as if set forth in full herein. (Copies are attached as Exhs. A and B).

2. In addition to the points and authorities in the Prior Objections, showing why no payments of interim compensation should be made at this time, additional grounds have recently arisen. Specifically, a motion to convert this case to a chapter 7 liquidation has been filed and this motion is scheduled for a hearing on December 19<sup>th</sup>, the same date as the hearing on these fee applications. Before any ruling is made on these fee applications, they should be reviewed by any trustee appointed in this case.

3. Counsel Financial’s review of these fee applications is continuing and reserves its rights to supplement or amend this objection.

4. In accordance with the foregoing, no awards of interim compensation should be made at this time and no payments should be approved.

Dated: New York, New York  
December 12, 2019

DAVIDOFF HUTCHER & CITRON LLP

By: /s/ David H. Wander  
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